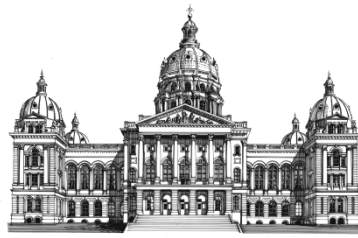


**Charles Isenhart**  
STATE REPRESENTATIVE  
*27th District*  
Statehouse: (515) 281-3221  
chuck.isenhart@legis.state.ia.us

HOME ADDRESS  
P.O. Box 3353  
Dubuque, Iowa 52004-3353  
Home: (563) 557-1261



**House of Representatives**  
State of Iowa  
*Eighty-Fourth General Assembly*  
STATEHOUSE  
**Des Moines, Iowa 50319**

**COMMITTEES**  
Environmental Protection,  
*Ranking Member*

Agriculture  
Economic Development Appropriations  
State Government  
Ways and Means

November 21, 2012

Chuck Gipp  
Director  
Department of Natural Resources  
502 E. 9th Street  
Des Moines, IA 50319-0034

Bill Northey, Secretary of Agriculture  
Chair, Water Resources Coordinating Council  
Department of Agriculture and Land Stewardship  
502 E. 9th Street  
Des Moines, IA 50319-0034

Dear Director Gipp and Secretary Northey:

I hope this letter finds you in good health and good cheer as we enter the extended holiday season.

I have received and reviewed the materials you have released with the governor's office and Iowa State University in connection with the proposed nutrient reduction strategy for Iowa. The information is substantial in scope and serious in its significance.

I am writing to respectfully request that you extend the public comment period by 30 days, until Monday, February 4, before a "final" version of the strategy is considered and adopted.

This will give the Watershed Planning Advisory Council an opportunity to review the documents and present consensus feedback, if desired. As you know, the Council will not be meeting again and cannot start such a process until December 6. As I understand it, the draft nutrient strategy was not originally scheduled for public release until that time. Had that timeframe been maintained, a 45-day comment period would have extended to at least January 21.

A February 4 deadline will also give you an opportunity to make presentations to and solicit the input of the relevant policy committees of the Iowa Senate and House of Representatives, after we convene on January 14. The current public input deadline, January 4, is before we convene.

In addition, I observe that a 30-day extension will give each stakeholder group an equal chance to consider the proposed strategy and comment on it. I understand that "select members of the stakeholder groups" that you have been working with -- such as Farm Bureau and various agricultural commodity groups, as well as the Iowa League of Cities, the Iowa Association of Business and Industry, and the Iowa Waste Water Association -- have been given a "head start" in reviewing and commenting on the documents. This privilege of extra time should be offered to all stakeholder groups and all Iowans.

The original draft was dated October 8. This suggests that some stakeholders already had up to 42 days to consider the strategy before its public release. In light of this, a 30-day extension for public comment is not unreasonable. This should not prevent the departments from making appropriations requests and drafting initial

policy bills based on the current draft. Amendments can be offered to reflect any changes made in the final documents.

Finally, insofar as we are adopting a strategy, and not administrative rules or even statutory language, I presume that our nutrient reduction initiative will be an evolving effort, based not only on the current science, but also on ever-improving knowledge of our current reality, as well as public support for clean water and strong state leadership to maintain clean water and restore impaired waterways. While we can continue to negotiate the proper balance between “regulatory,” “voluntary” and other means of continuous improvement, by no means should we be suggesting to anyone that clean water is “optional.”

I thank you for your consideration and attention. I look forward to continue working with you on these and related matters in the future.

Sincerely yours,

Rep. Chuck Isenhardt  
Ranking Member  
Environmental Protection Committee  
House Democratic Liaison, Watershed Planning Advisory Council